

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL NO. 23-00016
	:	
BHASKAR SAVANI, a/k/a "Dr. B"	:	
et al.	:	

SECOND BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY

The United States of America, by and through its attorneys, Jacqueline C. Romero, United States Attorney for the Eastern District of Pennsylvania, Sarah L. Grieb, Assistant United States Attorney, Chief, Asset Recovery and Financial Litigation Unit, Lesley S. Bonney, Kevin L. Jayne, and Meaghan A. Flannery, Assistant United States Attorneys, and Senior Policy Advisor Darrin McCullough and Trial Attorney Colin Trundle, U.S. Department of Justice, Money Laundering and Asset Recovery Section, Money Laundering and Forfeiture Unit, hereby files this Second Bill of Particulars for Forfeiture of Property.

The Notice of Forfeiture No. 1 in the Indictment, which was filed on January 18, 2023, seeks forfeiture, pursuant to 18 U.S.C. § 1963, of: (a) any interest acquired and maintained in violation of 18 U.S.C. § 1962; (b) any interest in, security of, claims against, or property or contractual rights of any kind which afford a source of influence over, any enterprise which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of 18 U.S.C. § 1962; and (c) any property constituting or derived from proceeds obtained, directly and indirectly, from such racketeering activity, in violation of 18 U.S.C. § 1962. The Notice of Forfeiture No. 5 in the Indictment, seeks forfeiture, pursuant to 18 U.S.C. § 982(a)(1), of any property, real or personal, involved in the violations of 18 U.S.C. §§ 1956 and 1957, and any property traceable to such property. On January 19, 2023, the government

filed a Bill of Particulars listing additional specific property that the United States is seeking to forfeit pursuant to 18 U.S.C. § 1963.

The United States hereby gives notice that, in addition to the property already listed in the Notices of Forfeiture Nos. 1 and 5 and the Bill of Particulars, the United States is seeking forfeiture of the following additional property, as: (1) an interest acquired and maintained in violation of 18 U.S.C. § 1962, an interest in, security of, claims against, or property or contractual rights of any kind which afford a source of influence over, any enterprise which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of 18 U.S.C. § 1962, and as property constituting or derived from proceeds obtained, directly and indirectly, from such racketeering activity, in violation of 18 U.S.C. § 1962, pursuant to 18 U.S.C. § 1963; and (2) property, real or personal, involved in the violations of 18 U.S.C. §§ 1956 and 1957, and any property traceable to such property, pursuant to 18 U.S.C. § 982(a)(1):

- a. One 2018 Cirrus Aircraft, Serial No. SR22T-1710, Reg. No. N717AA, and the Historical Maintenance Log Books.

Respectfully submitted,

JACQUELINE C. ROMERO
United States Attorney

/s/ Sarah L. Grieb

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Money Laundering & Asset Recovery Section
U.S. Department of Justice, Washington, D.C.

Date: February 16, 2023

CERTIFICATE OF SERVICE

I hereby certify that this Second Bill of Particulars for Forfeiture of Property has been served on the Filing Users identified below through the Electronic Case Filing (ECF) system:

Henry Hockheimer, Esquire
Terence Grugan, Esquire
BHASKAR SAVANI a/k/a "Dr. B"

Paul Hetznecker, Esquire
ARUN SAVANI

Abraham Rein, Esquire Ron Levine, Esquire
NIRANJAN SAVANI a/k/a "Nin"

Patrick Egan, Esquire
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/s/ Sarah L. Grieb

SARAH L. GRIEB

Assistant United States Attorney

Date: February 16, 2023